REMARKS

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-3, 5-16, 18-29 and 31-40 are all the claims pending in the application. Applicant respectfully submits that the claims define patentable subject matter.

Claims 1-3, 5-16, 18-29, and 31-40 remain rejected under 35 U.S.C. § 103(a) as being unpatentable over Hedin et al. (U.S. Patent No. 6,185,535, hereafter "Hedin") in view of King (U.S. Patent No. 6,532,446) and newly cited D'hoore et al. (U.S. Patent No. 6,085,160, hereafter "D'hoore"). Applicant respectfully traverses the prior art rejections.

Independent claim 1 and analogous independent claims 14 and 27 recite in part:

> translating the voice data to text;
>
> determining whether to filter the translated text; and
>
> if it is determined that the translated text is to be filtered, applying a filter to the translated text;
>
> wherein the voice data is translated to text using a voice print, and the translated text is returned to the device, and
>
> wherein the voice print is retrieved from a datastore based on the device identifier.

The Examiner acknowledges that Hedin and King do not teach or suggest the element "wherein the voice data is translated to text using a voice print", as recited in the claims. The Examiner thus relies on D'hoore to allegedly cure this conceded deficiency. Applicant respectfully disagrees with the Examiner's position.

D'hoore is focused on a method for using language models for recognizing words of different languages. A speech pre-processor receives input speech and produces a speech related

signal representative of the input speech. A database of acoustic models represents each subword unit in each of a plurality of languages. The language model characterizes a vocabulary of recognizable words, and a speech recognizer compares the speech related signal to the acoustic models and the language model and recognizes the input speech as a specific word sequence. The words in the vocabulary of recognizable may be describes by a voice print which is comprised of a user trained sequence of acoustic models from the database (column 1, lines 45-53 and column 2, lines 1-6).

D'hoore attempts to solve a problem that prior art speech recognition systems have in recognizing speech from non-native speakers, since non-native speakers sometimes do not pronounce words or sounds correctly, and may produce sounds that cannot be represented well by the model database of a single language model. D'hoore thus uses algorithms such as speaker dependent training of words to try to find the best possible phonetic representation for a particular word based on a few utterances of that word by the user. A word can be added to the recognizer by having the user pronounce the word a few times, and the system automatically constructs the best possible phoneme or model unit sequence to describe the word based on the uttered speech. This sequence is the voice print (column 7, lines 32-54). Accordingly, the voice print of D'hoore is used to recognize utterances of the trained word by the speaker and to match the speech of the targeted speaker. D'hoore does not use the voice print to translate voice data to text.

In the Amendment filed on May 1, 2008, Applicant submitted that there is no teaching or suggestion in D'hoore that the voice print is used to translate voice data into text. Applicant

further argued that D'hoore appears to use the voice prints in order to obtain the proper enunciations or pronunciations of the words in the specific language of the user.

In response, the Examiner asserts:

> Firstly, the applicant's arguments (Remarks: page 4, paragraphs 2-3) appear to suggest that the speech recognition does not convert (translate) speech (voice data) into text (symbols) only because D'hoore does not expressly use the words "translate" and "text". However, this is not persuasive because one of ordinary skill in the art would have recognized that these words could be replaced by other equivalent words, such as convert/recognize/map/match and symbol/words/written-string, and converting speech into text (speech-to-text) would be an implicit/necessary functionality of speech recognition, in nature. It is noted that, D'hoore indeed uses the equivalent (or alternative) words to teach that `speech recognition system is restricted to mapping (translating) the speech onto language specific symbols (text)' (D'hoore: col. 7, lines 36-38). D'hoore also teaches that `the system will automatically construct the best possible phoneme or model unit sequence to describe the word (text), based on the phoneme model database and the uttered speech', `this sequence is referred to as a voice print' that `can be used to recognize utterances of the trained word by the speaker', and `it can **also** be used to check or detect the identity of the speaker' (D'hoore: col. 7, lines *32-55).* One of ordinary skill in the art would have readily recognized that D'hoore's disclosure teaches the two different features: speech recognition that maps speech to text (symbols) and speaker identification (or verification) that identifies a targeted speaker, both using voice print.[2]

[2] Pages 3-4 of the Office Action dated August 8, 2008.

Applicant respectfully disagrees with the Examiner's position and submits that the Examiner is reading subject matter into D'hoore that is simply not taught or suggested by the reference. As discussed above, D'hoore describes a system which allows a speech recognition system to recognize different pronunciations of words in different languages. D'hoore's voice print is used to produce phoneme models of the sounds of words uttered by non-native speakers. D'hoore does not teach or suggest using the voice print to translate voice data into text as required by the claims.

Accordingly, Applicant respectfully submits that independent claims 1, 14, and 27 should be allowable because the cited references do not teach or suggest all of the features of the claims. Claims 2, 3, 5-13, 15, 16, 18-27, 28, 29, and 31-40 should also be allowable at least by virtue of their dependency on independent claims 1, 14, and 27.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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Date: January 8, 2009